

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

**KERRIE CAMPBELL and
JAROSLAWA Z. JOHNSON,
individually, and on behalf of others
similarly situated,**

Plaintiffs,

v.

**CHADBOURNE & PARKE LLP,
MARC ALPERT, ANDREW GIACCIA,
ABBE LOWELL, LAWRENCE
ROSENBERG, HOWARD SEIFE, and
PAUL WEBER,**

Defendants.

Civ. No. 1:16-cv-06832 (JPO)

**NOTICE OF PLAINTIFFS' EMERGENCY MOTION FOR CORRECTIVE ACTION
AND RELATED RELIEF**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Emergency Motion for Corrective Action and Related Relief, the declarations of David Sanford and Kerrie Campbell and the exhibits attached thereto, and all prior filings and proceedings had herein, Plaintiffs, by and through their undersigned attorneys, will respectfully move this Court, before the Honorable J. Paul Oetken, United States District Judge, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 706, at such time and place as the Court may direct, for an Order granting the relief sought in the accompanying proposed order, and for any other relief the Court deems appropriate.

Dated: New York, New York
April 12, 2017

Respectfully submitted,



David W. Sanford (admitted *pro hac vice*)

Jeremy Heisler (JH-0145)

Andrew Melzer (AM-7649)

Alexandra Harwin (AH-3111)

Saba Bireda (admitted *pro hac vice*)

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